

Case Name: Nicomede v. City of New York, et al., Case Number: 19 4470 RRM
 CV - () (PK)

PROPOSED DISCOVERY PLAN/SCHEDULING ORDER

	DONE	NOT APPLICABLE	DATE
A. ACTIONS REQUIRED <u>BEFORE</u> THE INITIAL CONFERENCE			
1. Rule 26(f) Conference held			10/22/20
2. Rule 26(a)(1) disclosures exchanged			11/13/20
3. Requested:			
a. Medical records authorization			
b. Section 160.50 releases for arrest records			
c. Identification of John Doe/Jane Doe defendants			
4. Procedures for producing Electronically Stored Information (ESI) discussed			10/23/20
5. Confidentiality Order to be submitted for court approval (see Proposed Confidentiality Order on the Chambers website)			2/15/21
B. SETTLEMENT PLAN			
1. Plaintiff to make settlement demand			11/27/20
2. Defendant to make settlement offer			12/27/20
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date to be completed)			
4. Settlement Conference (proposed date)			1/11/21
Ex parte settlement statements due 1/4/21			
C. PROPOSED DEADLINES			
1. Motion to join new parties or amend pleadings			2/12/21
2. Initial documents requests and interrogatories			1/15/21
3. All fact discovery to be completed (including disclosure of medical records)			10/12/21
4. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed			10/15/2021
5. Expert discovery (only if needed)	Check here if not applicable <input type="checkbox"/>		

Plaintiff expert proposed field(s) of expertise:			
Defendant expert proposed field(s) of expertise:	Information technology		
	DONE	NOT APPLICABLE	DATE
a. Affirmative expert reports due			11/26/21
b. Rebuttal expert reports due			12/17/21
c. Depositions of experts to be completed			1/31/22
6. Completion of ALL DISCOVERY (if different from C.3)			1/31/22
7. Joint status report certifying close of ALL DISCOVERY and indicating whether dispositive motion is anticipated			2/28/22
8. If any party seeks a dispositive motion , date to (a) file request for pre-motion conference (if required), or (b) file briefing schedule for the motion			3/4/22
9. Proposed Joint Pre-Trial Order due (if no dispositive motion filed)			3/31/22
D. CONSENT TO MAGISTRATE JUDGE JURISDICTION			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motion?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
2. All parties consent to Magistrate Judge jurisdiction for trial?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY			
1. Motion for collective action certification in FLSA cases			
a. Response due			
b. Reply due			
2. Motion for Rule 23 class certification			
a. Response due			
b. Reply due			

This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

Peggy Kuo

PEGGY KUO
United States Magistrate Judge

November 13, 2020

Date